

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO**

<b>UNITED STATES OF AMERICA</b>	)	<b>CASE NO. 4:16-cv-00511-BYP</b>
	)	
<b>Plaintiff</b>	)	<b>JUDGE BENITA Y. PEARSON</b>
	)	
<b>vs.</b>	)	
	)	<b>ANSWER OF TRUMBULL</b>
<b>ROBERT C. HANEY, JR., et al.</b>	)	<b>COUNTY AND CONSENT TO</b>
	)	<b>DECREE IN FORECLOSURE</b>
<b>Defendants</b>	)	
	)	

1. Now comes the Defendant, Trumbull County, Ohio, and for its Answer to the Complaint of the Plaintiff admits that the Treasurer has an interest and claim in and against the premises situated in Trumbull County, Ohio and further described in said Complaint for real estate taxes, assessments, interest and penalties if any.

2. Further answering, this Defendant denies each and every other allegation contained in the Complaint because of lack of knowledge of the truth or validity of the same except for those matters of public record which are admitted.

3. Defendant further states that the taxes due and owing on any and all parcels described in the Complaint are reflected in the attached most recent tax bill. Said tax bill is attached hereto and incorporated within this Answer as

if fully written. Pursuant to Ohio R.C. §323.11, the taxes are as of this date a lien against the subject property. In addition, during the course of this proceeding additional taxes, assessments, penalties and/or interest may become due and payable in an amount yet to be determined. Said taxes, assessments, penalties and interest thereon are a first statutory lien on said property under Ohio R.C. §35721.10.

WHEREFORE, Defendant prays that its liens be protected and accorded their rightful priority and that the entire amount of its liens be paid plus any costs and for any other relief the Court deems proper.

Respectfully submitted,

/s/ Lynn B. Griffith III  
Lynn B. Griffith III (Ohio Reg.#0003313)  
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Counsel for Defendant Trumbull County

**NOTICE TO PLAINTIFF: The above signature constitutes consent by Defendant Trumbull County to a Decree in Foreclosure so long as the lien of the Trumbull County Treasurer is afforded priority after Court costs. It is not necessary to obtain separate approval.**

**CERTIFICATE OF SERVICE**

On the 3rd day of May, 2016, I served a copy of this proposed Answer by causing copies to be placed in U.S. mail, addressed to:

Mary Stallings, Esq.  
U.S. Department of Justice, Tax Division  
P.O. Box 55 Ben Franklin Station  
Washington, D.C. 20044

Darlene Fawkes Pettit, Esq.  
Assistant Attorney General  
Collections Enforcement Section  
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/s/Lynn B. Griffith III  
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